

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 98-58

DIRECT TESTIMONY OF

PAUL D. REED

ON BEHALF OF

SPRINT COMMUNICATIONS COMPANY, L.P.

October 27, 1998

1 A. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Paul D. Reed. My business address is 7301 College Blvd. Overland
3 Park Kansas, 66210.

4 Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR CURRENT
5 POSITION?

6 A. I am employed by Sprint Communications Company, L.P. (ASprint@) as Group
7 Manager-Local Market Development for the Northeastern Region. I am responsible
8 for establishing Sprint local telephone service throughout New York and New
9 England, including the state of Massachusetts.

10

11 Q. HAVE YOU EVER TESTIFIED BEFORE THIS OR ANY OTHER STATE
12 PUBLIC SERVICE COMMISSION?

13 A. Yes. While I have not yet testified before the Massachusetts Department of
14 Telecommunications and Energy (ADepartment@), I have testified before the New
15 York Public Service Commission in its proceeding to review BA-NY=s draft Section
16 271 filing (NY PSC Case 97-C-0271).

17

18 Q. PLEASE DESCRIBE YOUR EDUCATION AND INDUSTRY EXPERIENCE.

19 A. I have a BS degree in business from Tarkio College. I began working in the
20 telecommunications industry in 1967 for Southern Bell Telephone. In 1968 I joined
21 United Telephone (AUnited@), an independent local telephone company. I have
22 twenty-seven years experience with United and Sprint=s local telephone operations,
23 primarily in operations and customer service, including assignments in network and

1 outside plant, maintenance and provisioning, receive repair and dispatch, and large
2 customer account management. Since July 1996, I have been involved in all aspects
3 of establishing Sprint local exchange service in the New York City Metropolitan
4 Service Areas (AMSA@). In addition I have ordered physical collocation space for
5 Sprint from Bell Atlantic and BellSouth.

6

7 Q. PLEASE EXPLAIN THE PURPOSE OF YOUR TESTIMONY.

8 A. The purpose of my testimony is to request that the Department establish
9 procedures to address New England Telephone and Telegraph, d/b/a/ Bell
10 Atlantic B Massachusetts= denial of competitive local exchange carriers=
11 (ACLECs@) requests for physical collocation.

12

13 Q. HAS SPRINT REQUESTED PHYSICAL COLLOCATION IN
14 MASSACHUSETTS FROM BELL ATLANTIC?

15 A. Yes, on September 26, 1998, Sprint submitted a written application for 100 square
16 feet of physical collocated space at Bell Atlantic=s Cambridge (CMBMABE) MA
17 central office. Sprint=s application included a check for \$10,288.04 representing
18 20% of the non-recurring charge for the space. In addition, the cover letter for the
19 application asked Bell Atlantic to provide the average loop length, the percentage of
20 customers that are served by loops within 18,000 feet of the office and the
21 percentage of customers served by digital line concentrators (ADLCs@). B *see*
22 *Attachment #1.*

23

1 Q. HAS BELL ATLANTIC REPLIED TO SPRINT=S REQUEST?

2 A. Yes, on October 12, 1998 Sprint received a brief rejection letter from Mr. Frank Joy,
3 Senior Project Manager for Bell Atlantic, stating, ANo Physical Collocation space
4 is available at this office@. Mr. Joy also returned Sprint=s application and check.
5 No mention was made of the requested loop information. B *see Attachment # 2*.

6

7 Q. DID BELL ATLANTIC=S LETTER PROVIDE ANY ADDITIONAL
8 INFORMATION ABOUT THE UNAVAILABILTY OF SPACE IN THE
9 CAMBRIDGE CENTRAL OFFICE?

10 A. No, Bell Atlantic made no attempt to explain why the request for physical
11 collocation was rejected. Further, no offer was made to investigate or ask if
12 additional information could be provided. Sprint is attempting to build a new
13 business. We attempt to incorporate all the relevant factors available when
14 making a business decision, including this collocation decision. When we are
15 confronted with an uninformative response such as ANo Physical Collocation
16 space is available at this office,@ we require more information to properly
17 manage our company in order to deliver the ubiquitous services our customers
18 expect from Sprint.

19

20 Q. DID SPRINT REQUEST ADDITIONAL INFORMATION CONCERNING
21 THE LACK OF SPACE IN THE CAMBRIDGE CENTRAL OFFICE?

22 A. Yes, on October 13, 1998 I sent a letter to Mr. Joy via facsimile and U. S. mail
23 requesting that he provide documentation substantiating the lack of space in the

1 Cambridge central office. B *see Attachment # 3.* The same request was also
2 made in a conference call on October 15, 1998 with Bell Atlantic=s account
3 manager for Sprint, Ms. Mary McNabb, and Bell Atlantic=s Collocation Project
4 Manager, Mr. Joe Long. Mr. Long informed me that he was unable to provide
5 the level of detail requested in my letter of October 13. He suggested that I
6 inform Mr. Joy that the letter was a formal and/or a Bona Fide request. Bell
7 Atlantic would not provide the information directly to Sprint, but would provide
8 it to the Massachusetts regulatory body, who would provide the information to
9 Sprint.

10

11 Q. DID SPRINT MAKE A AFORMAL REQUEST@?

12 A. Yes, on October 15, 1998 via facsimile and U.S. mail, I asked Mr. Joy to consider
13 my letter of October 13, 1998 as a formal and/or a Bona Fide request. - *see*
14 *Attachment #4.*

15

16 Q. WHAT EFFECT DID BELL ATLANTIC=S DENIAL FOR SPACE IN THE
17 CAMBRIDGE CENTRAL OFFICE HAVE ON SPRINT=S MARKET ENTRY
18 PLANNING FOR THE CAMBRIDGE, MA MARKET?

19 A. The cryptic response ANo Physical Collocation space is available at this office@
20 leaves many unanswered questions: Why is there no space available? Is this a
21 temporary or permanent situation? What alternatives are available? Is there
22 office, storage, or other administrative space that can be cleared to accommodate
23 our request? Can space be made available by removal of unused or under used

1 equipment? Is there less than 100 square feet available? Is there an adjacent
2 space not considered part of the central office that could be used? Are there
3 compromises that can be made to our preferred design that will allow the
4 collocation? Until these and other business questions are answered, Sprint
5 doesn't have the necessary information available to make a rational and
6 financially responsible business decision. This information is critical to enter the
7 market served by this central office. Sprint believes Bell Atlantic or any
8 incumbent local exchange carrier should exhaust all reasonable possibilities
9 before denying a request for physical collocation.

10

11 Q. IS OTHER INFORMATION NECESSARY FOR SPRINT TO MAKE A
12 RATIONAL AND FINANCIALLY RESPONSIBLE BUSINESS DECISION?

13 A. Yes, in order to provide broadband services, such as Sprint's ION product, loops
14 capable of carrying xDSL service are required. Before incurring the cost of
15 collocation, Sprint needs to know the number and percentage of customers that
16 cannot be served by xDSL unbundled loops. Sprint needs to understand the number
17 of marketable customers with loops exceeding 18,000 feet and the number of
18 customers served by DLCs. This information is available to Bell Atlantic for its own
19 internal use and should be made available to CLECs. As stated earlier, Sprint
20 requested this information from Bell Atlantic in the cover letter accompanying our
21 collocation request.

22

23 Q. WHAT ACTION IS SPRINT REQUESTING THE DEPARTMENT TO

1 IMPLEMENT?

2 A. Sprint is requesting the Department to adopt the collocation procedures outlined
3 in Teleport Communications Group, Inc.'s (ATCG's) May 14, 1998 petition,
4 with three exceptions: **1.** Sprint believes that 45 business days before an office is
5 proven to have no space available (TCG petition - page 15) is an excessive delay
6 for collocators. The presentation of the audit team findings should be reduced
7 from 20 business days to 10 business days (TCG petition B page 14). This would
8 reduce the maximum time for resolution from nine weeks to seven weeks. **2.**
9 (TCG petition - page 10) With respect to space reserved for use by Bell Atlantic
10 or its affiliates, Bell Atlantic should only be able to reserve space needed for the
11 deployment of central office equipment within the next year on a rolling basis. If
12 the space is not earmarked for such use and justified accordingly, it should be
13 available for collocation. **3.** Bell Atlantic should be required to provide, when
14 requested, average loop length, percentage of all loops longer than 18,000 feet
15 from the central office, and the percentage of customers served by DLCs.

16 Q. PLEASE SUMMARIZE YOUR TESTIMONY.

17 A. Bell Atlantic's actions relative to Sprint's request for physical collocation in the
18 Cambridge central office is representative of the problems in the current
19 application process for collocation space. Sprint supports TCG's proposed
20 requirement, with a few enhancements. In order to ensure fairness and
21 timeliness, the Department should adopt the guidelines outlined in TCG's
22 petition with the three exceptions proposed by Sprint: the shortened time frame to
23 verify that no space is available, the one year limit on reserved space, and provide

1 the requested xDSL loop information for the central office in question.

2

3 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

4 A. Yes, it does.